

STATE OF OREGON

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

TO: Debbie Flood
Superfund Program Management Section
EPA Region X

DATE: December 6, 1984

FROM: *J.L. Smits*
John L. Smits
Northwest Region, DEQ

SUBJECT: HW-3012 Superfund
Chapman Chemical Company (ORD 057068546)
Multnomah County

Chapman Chemical Company (a Kema Nobel Company) of 416 East Brooks Road, Memphis, Tennessee 38109, owns and operates a facility at 10505 N. Macrum Avenue, Portland, Oregon 97203. Chapman Chemical purchased the property and facility in December 1980 from Pacific Resins and Chemicals Inc. presently of 1754 Thorne Road, Tacoma, Washington 98421. Chapman began operation at the site during January 1981. A site locator map and copy of the Multnomah County Assessor's deed records are attached.

The Chapman Chemical Company site was inspected and production manager Lou Haefle and production worker Chuck Pearman were interviewed November 9, 1984.

Chapman Chemical Company formulates and repackages wood preservatives (pesticides) containing pentachlorophenol and tetrachlorophenol, copper 8-quinolinolate, copper naphthenate and sodium tetrachlorophenate as well as other chemicals for use in the wood products manufacturing industry. They also manufacture pigmented wax emulsions for use as sealers and end paints for wood products. Chapman Chemical provided a list of feedstocks used and the known CAS numbers have been added. The list is attached. Products produced by Chapman Chemical Company carry labels including the attached examples. Some have the EPA Est. No. 1022-OR-1 printed on them.

Raw materials arrive in bulk. Solvents arrive by tank car and are temporarily stored in tanks within a concrete diked area. Other ingredients arrive in drums or like pentachlorophenol in bags on pallets. Empty drums are returned to the supplier or used to hold finished product. Feedstock containers appear to be handled and stored properly.

The manager reported that products that are found to be off quality control specifications can be adjusted and used in other products.

All interior floor drains, exterior concrete or asphalt surfaces where chemicals are handled as well as tank farm drains are directed to a 20,000 gal. settling/holding tank. This tank is sampled and tested by a private laboratory or the city of Portland, Department of Public Works. If the

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results show the material meets discharge limits set by agreement between the city and Chapman Chemical, city crews unlock a pump and the tank contents are discharged to the publicly owned treatment works (POTW). A sampling manhole is present on the sanitary sewer line between the tank and the pumping station. A log of sampling results is attached.

The city has been requiring analysis for phenol before allowing discharge from the tank. It is our understanding that the regular test for phenol may not detect chlorinated phenols. This being the case, it appears that the city may be inadvertently allowing the discharge of pentachlorophenol and tetrachlorophenol to the sanitary sewer. This could have a significant impact on the microorganisms at the sewage treatment plant which is located about 1/2 mile from Chapman Chemical. This potential problem has been discussed with Harry Edmonds of the city of Portland, Department of Public Works.

The city of Portland is beginning the process of issuing formal waste discharge permits to industries discharging to the POTW. Chapman Chemical Company is considered by the city to be one of the top three companies they wish to get under permit.

Hazardous Wastes

Chapman Chemical Company is not presently registered as a hazardous waste generator. It appears that they need to register for the following reasons:

1. The city of Portland will not accept the contents of the 20,000 gal. holding tank if an oily sheen is present on the surface. Chapman uses sorbent pads to collect surface oil at the tank and from the troughs in the small tank farm area. These pads which may contain pentachlorophenol and tetrachlorophenol and other pesticides are placed into sealed drums which are stored in a secure location inside the warehouse area. The drums are labeled sludge or junk.
2. Incidental spills inside the plant that are cleaned up before reaching the floor drains and holding tank are placed into the same drums.
3. Solids removed from reactor kettles and any other pesticide contaminated debris are placed into the sealed drums.
4. Chuck Pearman, a long time employee at the facility and Pacific Resins the previous owner/operator, reported that about two (2) drums of hazardous waste accumulate at Chapman Chemical every two (2) to three (3) months. Four (4) drums were present at the time of this inspection.
5. A few months prior to this assessment inspection sixty (60) drums of pesticide contaminated waste including settled sludge from the 20,000 gal. holding tank were shipped to Chapman Chemical in

Memphis, Tennessee. The drums had accumulated during eighteen (18) months prior to shipment.

6. It was reported that the waste is recycled by the parent company in Memphis where the pesticides are pressed out or otherwise extracted. The resultant material is then used to treat railroad ties.

Chapman Chemical Co. is not registered as a hazardous waste generator and the shipment of the waste for recycling is not presently being regulated in compliance with Oregon Administrative Rules (OAR) 340-101-006. A memo has been directed to OR-DEQ Hazardous Waste Operations requesting that this apparent violation be resolved.

Backlog Reduction

As mentioned above, although a hazardous waste violation exists at the present time at Chapman Chemical Company, the problem involves primarily a need to complete paperwork necessary to register as a hazardous waste generator and comply with requirements covering hazardous waste recycling. The waste pesticide contaminated material appears to be handled correctly and there is no apparent threat to public health or the environment at the site. It is expected that the state will follow up regarding registration. It is recommended that Chapman Chemical Company (ORD 057068546) be placed into backlog reduction category B-5, a minor problem exists at the site, but the state has the regulatory authority to resolve the problem.

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cc: Hazardous Waste Operations, DEQ
Northwest Region, DEQ